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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,)	NO. 3:11-cr-00102-JO-1
)	
Plaintiff,)	DECLARATION OF COUNSEL IN
)	SUPPORT OF AMENDED THIRD
vs.)	UNOPPOSED MOTION TO
)	CONTINUE TRIAL
JARED DANIEL RILEY,)	
)	
Defendant.)	

DECLARATION OF MATTHEW G. MCHENRY

Matthew McHenry, as counsel for the defendant, does swear under penalty of perjury that the following is true:

1. I am the attorney of record for the defendant in the above-captioned case, having been appointed under the Criminal Justice Act on April 19, 2012.

2. Mr. Riley is charged in an indictment dated March 11, 2011, with Conspiracy to Possess with Intent to Distribute Oxycodone in violation of 21

USC § 841 and § 846, one count of Possession with Intent to Distribute Oxycodone in violation of 21 USC § 84, once count of Attempt to Obtain a Controlled Substance by Fraud in violation of 21 USC § 843, one count of Obtaining a Controlled Substance by Fraud in violation of 21 USC § 843, one count of Conspiracy to Possess with intent to use Five or More Identification Documents in violation of 18 USC § 371 and § 1028, and one criminal forfeiture count.

3. Additional time is necessary to complete investigation and review the additional discovery that is expected.

4. I understand that my client may also be charged in other federal jurisdictions for similar conduct. Additional time is necessary to explore the possibility of a global resolution in the event new charges are issued outside of this jurisdiction. I understand that the United States Attorneys Office in the District of Arizona has recently made some progress with respect to charging decisions regarding my client in that District. I am waiting to hear back from that office with details.

5. I have spoken with my client about his speedy trial rights under 18 U.S.C. § 3161. Mr. Riley agrees with the motion to continue the case, understands his speedy trial rights, and has agreed to waive them for the period of time between the current trial date (November 13, 2012) and the

next trial date to be assigned, approximately February 11, 2013, or a trial date set thereafter by the court in response to the attached motion.

6. I have spoken with AUSA Pamala Holsinger regarding this motion, and the government has no objection.

7. I have spoken with Samuel Kauffman, counsel for my client's co-defendant, Elysabeth Leitner. Mr. Kauffman has no objection to this motion.

DATED: November 5, 2012.

/s/ Matthew G. McHenry
Matthew G. McHenry